

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

INNOVATIVE GLOBAL SYSTEMS LLC,

Plaintiff,

v.

VOLVO CONSTRUCTION EQUIPMENT  
NORTH AMERICA, INC., VOLVO  
TRUCKS NORTH AMERICA, INC.,  
KOMATSU AMERICA CORP.,  
CATERPILLAR INC., HYUNDAI  
CONSTRUCTION EQUIPMENT  
AMERICAS, INC., TOPCON TIERRA,  
STARTRAK SYSTEMS, LLC, WIRELESS  
MATRIX USA, LLC, JLG INDUSTRIES  
INC., TYLER TECHNOLOGIES, INC.,  
GEOTAB, INC., and NAVISTAR, INC.,

Defendants.

Case No. 6:10-CV-00327-LED-JDL

**JURY TRIAL DEMANDED**

**DEFENDANTS' NOTICE OF COMPLIANCE LOCAL RULE 4-2 PRELIMINARY  
CLAIM CONSTRUCTIONS AND IDENTIFICATION OF EXTRINSIC EVIDENCE**

Defendants Defendants Volvo Trucks North America ("Volvo Trucks"), Volvo Construction Equipment North America, Inc. ("Volvo Construction"), StarTrak Systems, LLC ("StarTrak") and Caterpillar Inc. ("Caterpillar") hereby certify that on May 9, 2011, a true and correct copy of their Local Rule 4-2 Preliminary Claim Constructions and Identification of Extrinsic Evidence was served as required pursuant to the Patent Local Rules and the Court's Docket Control Order (Docket No. 165) on Plaintiff Innovative Global Systems, LLC ("Plaintiff").

Dated: May 9, 2011

Respectfully submitted,

/s/ Gary J. Fischman (with permission)

Robert G. Abrams – Lead Attorney

Gregory J. Commins, Jr.

BAKER & HOSTETLER

Washington Square, Suite 1100

1050 Connecticut Avenue, N.W.

Washington, DC 20036

Telephone: 202.861.1500

Facsimile: 202.861.1783

Email: rabrams@bakerlaw.com

Email: gcommins@bakerlaw.com

Gary J. Fischman

Texas Bar No. 00787469

WINSTON & STRAWN LLP

1111 Louisiana, 25th Floor

Houston, Texas 77002

Telephone: 713.651.2600

Facsimile: 713.651.2700

Email: gfischman@winston.com

**ATTORNEYS FOR DEFENDANT  
CATERPILLAR INC.**

/s/ Gregory V. Novak (with permission)

Gregory V. Novak – Lead Attorney

Texas State Bar No. 15119600

NOVAK DRUCE & QUIGG LLP

1000 Louisiana Street

Fifty-Third Floor

Houston, TX 77002

Telephone: 713.571.3400

Facsimile: 713.456.2836

gregory.novak@novakdruce.com

**ATTORNEY FOR DEFENDANTS  
VOLVO TRUCKS NORTH AMERICA,  
VOLVO CONSTRUCTION NORTH  
AMERICA, INC. AND STARTRAK  
SYSTEMS, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this May 9, 2011, with a copy of this document via the Court's ECF filing system. Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Gary J. Fischman  
Gary J. Fischman